

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>Plaintiff,</b>	:	<b>CASE NO. 2:20-MJ-288</b>
	:	
<b>v.</b>	:	
	:	<b>MAGISTRATE JUDGE JOLSON</b>
<b>LEATHA SAVAGE,</b>	:	
	:	
<b>Defendant.</b>	:	

**JOINT MOTION FOR EXTENSION OF TIME DURING WHICH  
INDICTMENT/INFORMATION MUST BE FILED**

Now come the parties, through their undersigned attorneys, and jointly move this Court for an order extending the time for the return of an Indictment or Information pursuant to 18 U.S.C. § 3161(b), for thirty (30) days from **Thursday, September 16, 2021, until Monday, October 18, 2021**. The defendant, Leatha Savage, is aware of her right to a timely filing of an Indictment or Information afforded under 18 U.S.C. § 3161(b) and hereby waives that right for the purposes of this motion.

The parties believe this continuance would serve the interests of justice and that the time would be excludable pursuant to 18 U.S.C. § 3167(h)(7)(A).

The Government and counsel for the Defendant are in continued plea negotiations and need additional time to review evidence and discuss possible resolution of this case. The parties are in agreement that a continuance of the time to file an Indictment or Information would best serve the interests of justice, and that the time period from **Thursday, September 16, 2021, until Monday, October 18, 2021**, would be excludable pursuant to 18 U.S.C. § 3161(h)(7)(A).

For all of these reasons, the parties request an extension of the time within which to file an Indictment or Information in this case. The new date requested is **Monday October 18, 2021**.

Respectfully submitted,

VIPAL J. PATEL  
Acting United States Attorney

s/Sam Shamansky

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